

W.K., et al v. Red Roof Inns, Inc., et al

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.,
D.P., A.F., C.A., R.K. and K.P.,

Plaintiffs,

vs.

RED ROOF INNS, INC.; FMW RRI
NC, LLC; RED ROOF FRANCHISING,
LLC; RRI WEST MANAGEMENT, LLC;
VAHARI HOTEL, LLC; WESTMONT
HOSPITALITY GROUP, INC.;
and RRI III, LLC,

Defendants.

VOLUME I

VIDEOTAPED DEPOSITION OF C.A.

March 3, 2022

12:40 p.m.

1960 Satellite Boulevard, Suite 4000

Duluth, Georgia

Carolyn M. Carboni, RPR, RMR, CCR-B-878

Leo Mileman, Videographer

PL Sum. J.
Ex. 020

CIVIL ACTION NO.:

1:20-CV-05263-MHC

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1 APPEARANCES OF COUNSEL:

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3 Westmont Hospitality Group, et al. case:

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1 APPEARANCES (Continued):

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3 FMW RRI NC, LLC; Red Roof Franchising, LLC; RRI
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1 APPEARANCES (Continued):

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11 (Pursuant to Article 10(B) of the Rules
12 and Regulations of the Georgia Board of Court
13 Reporting, a written disclosure statement was
14 submitted by the court reporter to all counsel
15 present at the proceeding.)
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25

1 A Yeah. I mean -- yeah.

2 Q Well, let me ask you this, and I want to
3 continue, but you allege from 2009 to 2014, you
4 were allegedly trafficked at the Red Roof in North
5 Druid Hills, which I may refer to --

6 MR. ALLUSHI: Can you get that address so
7 I can have it on the record, what the address is?

8 BY MR. ALLUSHI:

9 Q I will refer to it throughout the
10 deposition as either Red Roof North Druid Hills or
11 Red Roof Buckhead.

12 How many times between 2009 and 2014 you
13 stayed at the Red Roof Inn?

14 A To my account, anywhere from 30, 50. I
15 even believe it could possibly be more than that
16 actually.

17 Q Okay. Well, let's take it by year because
18 I know -- I know you have -- you have -- okay. And
19 then just for the record, the Red Roof -- the
20 subject property we're talking about here today,
21 Ms. [REDACTED] is the Red Roof North Druid Hills at
22 sixty -- at 1960 North Druid Hills Road, Northeast,
23 Atlanta, Georgia 30329. And that's the -- is that
24 the hotel you allegedly -- that you stayed and were
25 trafficked?

1 A Yes.

2 Q And we're going to refer to that as either
3 the Red Roof North Druid Hills or Red Roof
4 Buckhead.

5 A That's fine.

6 Q And I know in the -- and we can go and
7 look at those specifically, but in these responses,
8 you've said that in 2010, you allegedly stayed at
9 the Red Roof North Druid Hills 10 times. Does that
10 sound right?

11 A Yes, yes, it does.

12 Q And what about in 2009, how many times
13 would you say?

14 A A few to -- I mean -- so in 2009, it was
15 the end of the year, so -- and that was a very long
16 time ago, so...

17 Q Sure.

18 A I also blocked a lot of things out. So, I
19 mean, a handful of times to be --

20 Q Less than 10?

21 A I mean, that would be fair.

22 Q And what about 2011?

23 A 2011, a lot of times. Also, the Red Roof
24 Inn, lots more. 2011, probably also like 10 times,
25 about 10 times.

1 Q And 2012?

2 A 2012, not as many. It was a little bit
3 less.

4 Q Less than five?

5 A Five is good.

6 Q And what about 2013?

7 A Definitely, like at least -- I mean, are
8 we -- so just to --

9 Q Just approximate, yeah.

10 A Just to be specific, are we talking about
11 how many times like actually going in and checking
12 in or are we talking about nights or stays?

13 Q I'm specifically asking how many times you
14 stayed the entire stay at that hotel, whether
15 you --

16 A I have --

17 Q Whether you checked in or, you know, the
18 room was on somebody else's name.

19 A Right.

20 Q I'm just -- you know, where you were
21 physically at the Red Roof Inn.

22 A How many stays, not how many nights?

23 Q How many -- yeah, how many times you were
24 physically at the Red Roof Inn Buckhead.

25 A Right. But I could have gone 15 stays and

1 it could have been 30 nights, you know what I mean?

2 Q Sure, yeah. By stay is what I'm saying,
3 correct.

4 A Okay. 2013, 2012?

5 Q Yeah, we're in 2013.

6 A Okay. So 2013, it was at least --
7 definitely at least 10 times, and also, we can go
8 ahead and jump to '14, too.

9 Q 10 times?

10 A Yeah, at least.

11 Q And I guess the full op question is: How
12 long were your stays? Did they vary?

13 A Right, yes, they did.

14 Q And was there a, like, was there an
15 average?

16 A So an average would be like two or three
17 nights. But in 2014, there was -- I stayed for
18 weeks.

19 Q In 2013, you stayed for --

20 A 2014 --

21 Q '14?

22 A -- I believe, yeah.

23 Q You stayed for?

24 A Weeks.

25 Q Weeks?

1 A Uh-huh.

2 Q How many weeks you think?

3 A Might have actually been 2013. I get
4 confused with the summer. At least three. It was
5 about three.

6 Q Okay.

7 A At a time.

8 Q And out of all these stays, was the room
9 in your name or somebody else's name?

10 A It was in my name I know sometimes, but
11 I'm not sure exactly which time or...

12 Q And out of all of these stays, do you have
13 any room folios or receipts showing that you stayed
14 at these hotels -- at this hotel, at the Red Roof
15 Inn North Druid Hills?

16 A I believe I do, yes.

17 Q Okay. You have the receipts?

18 A I believe that my lawyers do.

19 Q Okay. I don't believe I've seen any
20 receipts or folios of room stays, but if you do
21 have those, I ask that you -- and we'll look to
22 make sure that maybe we haven't missed anything,
23 but I don't believe any receipts have been
24 produced. So if you do have them, I ask that you
25 give them to your lawyer, or if you have given

1 them, then I'll ask your lawyer to produce those
2 for the record.

3 So going down the list here, Ms. [REDACTED]
4 the next person is [REDACTED] or Kwan?

5 A Yes, Kwan.

6 Q And Kwan was also one of the alleged
7 traffickers associated with this group, the PIVIP?

8 A Yes.

9 Q Did also Kwan specifically traffic you
10 allegedly?

11 A Yes.

12 Q Was that at the Red Roof Inn?

13 A Yes.

14 Q And what years was that?

15 A 2009 and '10.

16 Q And have you spoken to Kwan since 2009 and
17 '10?

18 A No. Oh, since 2009 and '10?

19 Q Yes.

20 A Yes, because he was -- I mean, yes, I
21 have, because he was always with my -- with my
22 trafficker, so...

23 Q Okay.

24 A Yeah.

25 Q And after 2014, have you spoken to Kwan?

1 A Like, yeah, six months.

2 Q August -- well, let's say August two
3 thousand --

4 A Sorry. It was a while ago, so my memory
5 is --

6 Q Sure.

7 A It's a lot of details.

8 Q So August 2010 through sometime in March
9 of 2011, you were at the sober living facilities?

10 A Correct.

11 Q And it's fair to say you weren't being
12 trafficked during those times, correct?

13 A It's fair to say that, correct.

14 Q And you weren't under the control of Bagz
15 or Fresh while you were in these facilities,
16 correct?

17 A It's somewhat fair to say that.

18 Q Why is it somewhat fair? Can you explain?

19 A I mean, to the best of my ability, I can
20 explain. I mean, I was -- not much longer, and,
21 you know, Fresh was in Florida and I was being
22 trafficked again.

23 Q Well, my question was: During the time
24 that you were in these facilities, you were not
25 under the control or influence of Fresh or Bagz,

1 correct?

2 A I was under somewhat of an influence, yes.

3 Q How?

4 A I mean, it's like a cult. It's
5 brainwashing. I mean, manipulation. I mean, there
6 was still an aspect of control there because I was
7 still in fear and I still -- you know, mental
8 control -- I'm not -- I'm trying to explain it to
9 the best of my ability.

10 Q Sure. Did you speak to them while you
11 were at the Sober Living?

12 A To Fresh, yes.

13 Q How?

14 A On the phone.

15 Q Did you have your -- go ahead.

16 A And he drove -- I think he came twice
17 while I was there and even met the people that I --
18 that were in charge.

19 Q And so your mother had told them that you
20 were allegedly being trafficked, but then the
21 alleged trafficker comes and visits you there?

22 A Well, this is a different one. So I was
23 at the Beachcomber, that's who she told. This was
24 the Sober Living where he came to, which was the
25 halfway house.

1 A No.

2 Q But at the Pink Pony, you received tips
3 for dancing?

4 A Yes.

5 Q And that would be naked dancing?

6 A Yes. And --

7 Q Would -- go ahead.

8 A No, you go.

9 Q No, please.

10 A I'll add later if I need to.

11 Q Okay. And the money you received from the
12 dancing at the Pink Pony, did you keep that money?

13 A No.

14 Q Where did that money go?

15 A To Bagz.

16 Q Did you perform any other sexual acts like
17 hand jobs, blow jobs or any other sexual acts while
18 you were at the Pink Pony?

19 A No.

20 Q You've never been married, Ms. [REDACTED]

21 A No.

22 Q I know you've been arrested a few times,
23 so I want to ask you specifically, instead of just
24 going by memory, I have your responses here on
25 page 11 if you'd like to refer back, Ms. [REDACTED]

1 manipulated and brainwashed you, right?

2 A They groomed -- I mean, I was being
3 brainwashed. They didn't -- yeah, I was being
4 brainwashed, but they definitely were grooming me
5 while, you know, this whole time, six months before
6 I ever -- you know, the first night it happened.
7 But yeah.

8 Q So how -- tell me how -- what happened
9 during those six months that convinced you that you
10 were going to have sex for money?

11 A I mean, they sold -- they sold the dream,
12 you know. I mean, they made everything look
13 glamorous and they -- you know, it was nothing like
14 I expected. I thought I would be, like, retired in
15 six months and, you know, living this glamorous
16 life.

17 And, you know, I ended up out of school,
18 you know, dropping out of college, losing custody
19 of my kid, and all the other things that, you know,
20 happened. But it definitely wasn't like something
21 I planned.

22 Q So when you say sold --

23 A Or there's not just like one thing --

24 Q Oh, sorry.

25 A -- that happened. It was, like,

1 calculated. I -- you know, it was very well
2 thought out and manipulated on their end. And I
3 was, like, very vulnerable and then easy, like,
4 candidate at the time, especially I was younger.

5 Q So when you say that they sold you the
6 dream and you'd get rich in six months, were you
7 thinking that you were going to keep all the money
8 and it was sort of like a business deal? Like, how
9 did that --

10 A Yeah, I mean, I thought that -- I
11 didn't -- I had no idea, like, what I was in for.
12 I mean, again, like, who chooses that? You know, I
13 didn't know I was going to be like -- sorry.

14 I just didn't know I was going to be,
15 like, in it for six years and not being able to,
16 like, get out. I didn't know I was going to be
17 brainwashed and, like, beat up and, you know -- I
18 had no idea.

19 Q And you thought this would be just a
20 business venture where you would keep the money and
21 they would get a percentage of it because -- was it
22 voluntarily at the beginning?

23 A I mean, I thought --

24 MS. MYKKELTVEDT: Object to the form.

25 BY MR. ALLUSHI:

1 A (Witness nods head.)

2 Q Do you recall what year that was?

3 A Two thousand -- I'm like which split face
4 now? 2014.

5 Q So how long after the alleged trafficking
6 or the sex for money, how long after that did Fresh
7 and Bagz become violent?

8 A Oh, I'm sorry. Could you say that one
9 more time?

10 Q So you started having sex for money in
11 2009, correct?

12 A Right.

13 Q And then were they violent immediately
14 when you met Fresh and Bagz or did that occur later
15 on, physical violence?

16 A It occurred slowly, like, but within the
17 first, you know, few months, yeah. But the
18 violence got worse and more normalized.

19 Q And then this incident with the split face
20 you describe in your interrogatory responses
21 occurred in 2014?

22 A I believe so.

23 Q And did you go to the hospital?

24 A I don't think so that time. I
25 didn't very -- I didn't go to the hospital ever

1 really. There was only, like, one time I ever went
2 to the hospital.

3 Q One time you went to the hospital because
4 of a beating?

5 A Yeah.

6 Q And when was that?

7 A 2013 maybe.

8 Q And did you tell them that Fresh or Bagz
9 beat you?

10 A No. I actually blamed it on my daughter.

11 Q You blamed it on your daughter?

12 A (Witness nods head.)

13 I said she threw a remote.

14 Q And why did you do that?

15 A I was scared. I was scared to tell the
16 police and -- I was -- I was scared.

17 Q And do you have any photographs of the
18 actual --

19 A I believe so, yeah.

20 Q And I'll show you a photograph later on
21 that you have produced and ask you which of these
22 incidents that is.

23 And on the incident that you went to the
24 hospital in 2013, you also did not call the police
25 about that, correct?

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CERTIFICATE

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

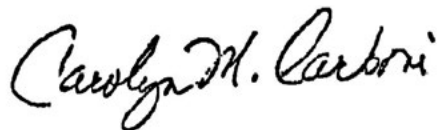
I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

I have no relationship of interest in this matter which would disqualify me from maintaining my obligation of impartiality in compliance with the Code of Professional Ethics.

I have no direct contract with any party in this action and my compensation is based solely on the terms of my subcontractor agreement.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.

This the 9th day of March, 2022.



CAROLYN M. CARBONI, RPR, RMR, CCR-B-878